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April 11, 2023

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *McKoy, et al. v. The Trump Corp., et al.*, Case No. 18-cv-09936 (LGS)**

Dear Judge Schofield:

This firm represents non-party ACN Opportunity, LLC (“ACN”) in these proceedings. On April 7, 2023, Defendants filed redacted and unredacted versions of their memorandum of law in opposition to Plaintiffs’ motion for class certification [ECF Nos. 551 (under seal), 553] and a declaration in support with multiple exhibits filed under seal [ECF Nos. 552 (under seal), 554]. Much of the redacted material in the memorandum and the related exhibits filed under seal implicate ACN’s non-public, sensitive business and financial information, which ACN designated confidential in discovery. For the same reasons identified in my March 14, 2023 letter regarding Plaintiffs’ class certification submissions [ECF No. 539], and pursuant to Rule I.D.3 of Your Honor’s Individual Rules and Procedures for Civil Cases, ACN respectfully requests that its non-public materials submitted under seal by Defendants remain sealed in the public record.

Respectfully,

A handwritten signature in black ink that reads 'Stephanie E. Niehaus'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stephanie E. Niehaus

cc: All Counsel of Record (via ECF)